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Attorneys for Defendant Facebook, Inc.,

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE: FACEBOOK, INC. CONSUMER
PRIVACY USER PROFILE LITIGATION,

This document relates to:

ALL ACTIONS

CASE NO. 3:18-MD-02843-VC

**FACEBOOK, INC.'S ADMINISTRATIVE
MOTION TO TEMPORARILY FILE
UNDER SEAL**

Pursuant to Civil Local Rules 7-11 and 79-5, as well as the parties' Stipulation, *see* Dkt. 609, Facebook, Inc. ("Facebook") hereby submits this Administrative Motion to Temporarily File Under Seal (i) Facebook's Brief In Opposition To Plaintiffs' Request For Privileged Investigatory Materials, and (ii) Exhibit A to Facebook's Brief in Opposition To Plaintiffs' Request For Privileged Investigatory Materials. These materials are being filed today pursuant to the Court's Discovery Order No. 12. Dkt. 602. Facebook moves for leave to temporarily file under seal these submissions.

Facebook's submissions contain non-public and highly sensitive details about a privileged internal investigation and summarize documents, including privilege logs, designated as "Confidential" under the Protective Order in this action. *See* Dkt. 122. Facebook anticipates that Plaintiffs' submissions also include a substantial amount of highly confidential information covered by the Protective Order. *See* Dkt. 609. But due to the simultaneous briefing deadline, the parties lacked sufficient time in advance of their filings to coordinate on which aspects of their filings require redactions and/or sealing. Accordingly, the parties entered a Stipulation to temporarily file these submissions under seal. *See id.* Pursuant to that Stipulation, on or before February 15, 2021, Facebook will file a particularized motion to seal these materials. Plaintiffs have consented to the temporary filing of these submissions under seal. *See id.*

Accordingly, Facebook respectfully requests that the Court allow it to file these materials under seal temporarily. By February 15, 2021, Facebook will file a particularized motion as to the confidential content contained in the parties' submissions.

Dated: February 5, 2021

GIBSON, DUNN & CRUTCHER, LLP

By: /s/ Orin Snyder

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CERTIFICATE OF SERVICE

I, Orin Snyder, hereby certify that on February 5, 2021, I electronically filed the foregoing with the Clerk of the United States District Court for the Northern District of California using the CM/ECF system, which shall send electronic notification to all counsel of record.

By: /s/ Orin Snyder
Orin Snyder